



United States Department of the Interior

BUREAU OF INDIAN AFFAIRS
NATIONAL INTERAGENCY FIRE CENTER
3833 SOUTH DEVELOPMENT AVENUE
BOISE, IDAHO 83705-5354

IN REPLY REFER TO:

September 23, 1999

Memorandum

To: Area Director, All Areas
Attn: Area Forester

From: Chief, Branch of Fire Management

Subject: Clarification of Seasonal/Temporary Employment in Fire Management

Personnel Bulletin No. 98-4 states that managers should examine their annually recurring work requirements to identify relevant seasonal work situations. The Bureau of Indian Affairs employs hundreds of individuals within fire management and it is important that each fire manager examines their fire positions to assure seasonal positions are placed in the proper category. The Office of Personnel Management (OPM) has identified three categories of seasonal employment which are;

1. Temporary seasonal appointments - these are non-permanent and less than six months in length. These positions are not eligible for health or life insurance. The only benefits are through social security.
2. Permanent seasonal appointments (furlough) - there are several criteria which must be met to convert from a temporary to permanent seasonal position. If any of these three criteria are met, the position must be converted. These are (a) whenever the same employee performs annually recurring periods of work of less than twelve months but more than six months each year, (b) whenever the same employee performs annually recurring work of more than 6 months for more than two years in a row, or (c) whenever the same employee works 24 months out of a 36 consecutive month period. The appointment described here receives service credit for probationary periods, career tenure, within-grade increases, leave, retirement, health and life insurance benefits.

The criteria above addresses instances that require converting temporary seasonal appointments to permanent seasonal appointments. There are other instances in which conversion of temporary appointments to permanent appointments are optional. One common instance is when the same employee fills the same temporary seasonal appointment and performs annual recurring work over a period spanning more than two years that lasts less than 6 months in any given year. These appointments are considered short-term permanent appointments and would receive the same benefits listed above except they are ineligible for health and life insurance.

3. Term seasonal appointments - this classification is intended for positions with annually recurring work of less than twelve months but more than six months a year. These positions are associated with a short-term, non-recurring project and will thus last from one to four years. These positions typically would be

funded as a subsidiary request due to their short duration. These positions receive service credit for probationary periods, career tenure, within-grade increases, leave, retirement, health and life insurance benefits.

The following recommendations are based on the interpretation of Personnel Bulletin No. 98-4 by this office.

1. Convert all classified temporary seasonal positions that meet the criteria in category 2 above to permanent seasonal appointments. This offers several advantages. Employees earn benefits, which should improve job satisfaction and help retain valued employees. Seasonal hiring procedures will be considerably simplified because a permanent seasonal is simply placed in non-pay status at the end of the season and then reactivated in pay status at the beginning of the next season (requiring only a SF-50 employee action).
2. It is highly recommended that basic entry level firefighter positions be filled by temporary appointments, as appropriate. These are typically positions where the same individual does not return for more than two years. This allows managers sufficient time to review employees and their work ethic and abilities. Terminating individuals who do not perform satisfactorily in these type of positions is relatively easier.

If it is determined necessary or desirable to convert a position from a temporary seasonal appointment to permanent seasonal appointment, it is recommended that an updated Fire Management Preparedness Analysis (FMPA) be submitted to accommodate increased employee benefit costs (EBC) for the Fiscal Year (FY) 2002 and subsequent years' budget request. This requires updating the FMPA personnel and summary worksheets and does *not* require performing any re-analysis.